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*Attorneys for Defendant*

United Parcel Service, Inc.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RICHARD LEBLANC,

Plaintiff,

v.

UNITED PARCEL SERVICE,

Defendant.

: Docket No. 1:11-cv-06983-KPF

:

**SUPPLEMENTAL AFFIRMATION OF  
HEATHER WEINE BROCHIN, ESQ.  
IN FURTHER SUPPORT OF UPS'S  
MOTION FOR SUMMARY  
JUDGMENT**

:

(Document Electronically Filed)

HEATHER WEINE BROCHIN, of full age, hereby affirms as follows:

1. I am an attorney-at-law of the States of New York and New Jersey and the United States District Courts for the four Districts in the State of New York and the District of New Jersey. I am also a member of the law firm of Day Pitney LLP, attorneys for defendant United Parcel Service, Inc. ("UPS") in the above-captioned matter. I submit this supplemental affirmation in further support of UPS's motion for summary judgment.

2. Attached hereto as Exhibit 1 is a true and correct copy of a letter dated January 18, 2013 that I sent to plaintiff's counsel.

3. Attached hereto as Exhibit 2 is a true and correct copy of the following electronic decision: *Hofheinz v. Discovery Communications, Inc.*, No. 09-cv-3802 (HB), 2001 U.S. Dist. LEXIS 14752 (S.D.N.Y. Sept. 20, 2001).

4. Attached hereto as Exhibit 3 is a true and correct copy of the following electronic decision: *EEOC v. Bloomberg, L.P.*, No. 07-cv-8383 (LAP), 2013 U.S. Dist. LEXIS 128388 (S.D.N.Y. Sept. 9, 2013).

Dated: October 18, 2013.

By: /s/ Heather Weine Brochin